

**From:** [Vargo, Steve](#)  
**To:** [Jackson, Mary](#); [Behan, Frank](#); [Hillyer, Kirsten](#); [Huggins, Richard](#); [Celeste, Laurel](#)  
**Subject:** FW: OK CCR program approval application  
**Date:** Wednesday, November 08, 2017 11:58:29 AM  
**Attachments:** [OAC 517 9 4.pdf](#)

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Mary: per our conversation. I thought this was sent to you earlier. My apologies if it was not. See the bottom for dates that the ODEQ room is currently available.

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**From:** Patrick Riley [mailto:patrick.riley@deq.ok.gov]  
**Sent:** Wednesday, November 01, 2017 11:20 AM  
**To:** Vargo, Steve <Vargo.Steve@epa.gov>  
**Cc:** Karen Jayne <Karen.Jayne@deq.ok.gov>; Hillary Young <Hillary.Young@deq.ok.gov>; David Cates <David.Cates@deq.ok.gov>; Snowbarger, Robert <Snowbarger.Robert@epa.gov>; Bellew, Renee <bellew.renee@epa.gov>; Jones, Bruce <Jones.Bruce@epa.gov>; Murdock, James <Murdock.James@epa.gov>; Alvarado, Tina <Alvarado.Tina@epa.gov>; Gee, Randy <Gee.Randy@epa.gov>  
**Subject:** OK CCR program approval application

Steve,

I have a few items to share in response to Monday's conference call.

1) As previously discussed, DEQ is proposing to revise Oklahoma Administrative Code (OAC) 252 Chapter 517 Disposal of Coal Combustion Residuals from Electric Utilities to correct invalid citations and typos, throughout the Chapter, and make other non-substantive administrative changes. Part of the proposed amendment will be to add language to the definition of "Representative sample." The underlined text is additional proposed language.

"Representative sample" means a sample of a universe or whole (e.g., waste pile, lagoon, and groundwater) which can be expected to exhibit the average properties of the universe or whole. See EPA publication SW-846, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, Chapter 9.

2) EPA asked how OAC 252:517 provided equivalency to that of Part 257.91(e)(1) and (2), relating to monitoring well documentation and, performance over the life of the facility. OAC 252:517-9-2 Contains equivalent language as that found in Part 257.91(e). See attached excerpt for reference.

3) It is important to note that while OAC 252:517 is modeled after Part 257, it provides the framework for a permit application approval process rather than functioning as self-implementing rules. Integral to the permit application approval process is review of permit applications by engineering staff for administrative and technical completeness in accordance with applicable rules and generally accepted engineering practices.

4) EPA asked about the availability of hosting a public hearing at the DEQ building in Oklahoma City in January 2018. A large multipurpose room with seating capacity for approximately 80 guests is

currently available the following dates: January 2-5, 8, 12, 15, 18, 19, 26, 29-31. Please advise of 2 or 3 preferred dates and times, so the room may be reserved.

Please contact me if you have any questions or for additional information. Thanks for your assistance with this process.

Patrick

**Patrick Riley**

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